



**OKLAHOMA**  
DEPARTMENT OF COMMERCE

**OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE # 04-2014**

**TO:** WIB Board Chairs  
WIB Board Staff  
Regional System Building Leadership Teams  
Partner Agency Staff  
Local Elected Officials

**FROM:** Deidre D. Myers  
Deputy Secretary of Commerce for Workforce Development

**DATE:** June 17, 2014

**SUBJECT:** Local Planning Guidance

**PURPOSE:** To provide Local Workforce Investment Boards (LWIBs) with guidance in preparation for required local planning.

**BACKGROUND AND CONTEXT:**

Section 118 (a) of the Workforce Investment Act states "In General – each local board shall develop and submit to the Governor a comprehensive 5-year local plan (referred to in this title as the 'local plan'), in partnership with the appropriate chief elected official. The plan shall be consistent with the State plan." WIA Section 118 (b) describes the content of the local plan and section (c) describes the process.

DOL had allowed state plans to be extended over the past few years, but effective last year, the state was required to produce a new 5-year plan. The state plan can be found on the Oklahoma Department of Commerce's website under the Workforce section. It can also be found by following the link below:

[http://okcommerce.gov/assets/files/workforce-development/WIA\\_State\\_Plan-Final.pdf](http://okcommerce.gov/assets/files/workforce-development/WIA_State_Plan-Final.pdf)

To further enhance talent development strategies, many WIB areas have volunteered to work toward regional system certification in cooperation and coordination with the Governor's Council's initiative. One of the outcomes of the system certification is having a regional unified plan that is done in conjunction with regional partners and incorporates some added elements that will ensure that the partners within the regional area are working toward common goals.

### **MINIMUM LOCAL PLAN CONTENT REQUIREMENTS:**

At a minimum, the local plan must include the following elements as found in section 118 (a)(b) of the act which includes:

1. Identification of:
  - the workforce investment needs of businesses, job seekers, and workers in the local area;
  - the current and projected employment opportunities in the local area;
  - the job skills necessary to obtain such employment opportunities; and,
2. A description of the One Stop delivery system within the local area, including:
  - the WIA service providers selected, the services they provide, and how the LWIB will ensure continuous improvement of eligible providers of services, and, that those providers meet the employment needs of local employers and participants
  - the fiscal agent, or entity responsible for the disbursement of grant funds
  - the number and location of the workforce centers (full centers, affiliate sites and access points including electronic access, libraries) that are supported by WIA funds and how they interact with those funded by other partner agencies
  - the competitive process to be used to award grants and contracts for activities carried out under this subtitle I of WIA, including the process to be used to procure training services that are made as exceptions to the Individual Training Account process (WIA section 134(d)(4)(G))
  - a copy of the local Memorandum(s) of Understanding (MOUs) between the Local Board and each of the service delivery partners concerning the operation and roles of each partner agency within the service delivery system.
3. Assess and describe the type and availability of adult and dislocated worker employment and training activities in the local area including:
  - services, nontraditional training, and employment activities available to displaced homemakers, disadvantaged individuals and to dislocated workers
  - how the LWIB's policies and procedures address employment and training services for Veterans and other persons eligible for those services in accordance with the Jobs for Veterans Act, all other applicable laws and U.S. Department of Labor guidance, to include encouraging area employers to hire Veterans and ensuring priority of services to Veterans and others eligible persons.
  - the process to determine the specific types of intensive services to be provided
  - the LWIB's training eligibility policy defining which core and intensive services must be provided before a recommendation for training is made
  - a description of the local ITA system and the procedures for ensuring that exceptions to the use of ITA's, if any, are justified under WIA section 134(d)(4)(G)(ii) and 20 CFR 663.430
  - the criteria to be used by the Governor and the Local Board, under 20 CFR 663.600, to determine whether funds allocated to a local area for adult employment and training activities under WIA sections 133(b)(2)(A) or (3) are limited, and the process by which any priority will be applied by the One-Stop operator

- the LWIB's current definition of "self-sufficiency" (Local boards must set criteria for determining whether employment leads to self-sufficiency - 20 CFR 663.230)
  - if the LWIB makes needs-related payments for adults (20 CFR 663.800), how often the policy/payment level is reviewed
  - how the LWIB's definition of a "general announcement" of a plant closing is shared with staff to determine dislocated worker eligibility and dislocated worker "target group" eligibility for Work Opportunity Tax Credit applications)
  - how the LWIB's policies and procedures adequately address the needs of self-employed individuals who become unemployed as a result of general economic conditions in their community because of natural disasters
  - the process and frequency for reviewing local policies with regard to OJT, skills upgrading or other customized training; the process for receiving, reviewing and approving requests for OJT, skills upgrading or other customized training; the point of contact and any subcommittee responsible for this function
  - how the board's Trade Act policies are aligned with the Dislocated Worker policies
4. Describe how the Local Board will coordinate local activities with Statewide rapid response activities including how laid-off workers will be informed of the LWIB's targeted industries and the assistance available to displaced workers desiring employment in those industries.
5. Assess and describe the type and availability of youth activities in the local area funded by WIA, including an identification of successful providers of such activities. Describe:
- how the ten program elements are provided within that framework
  - how youth program design is coordinated among the counties within the region
  - the strategy for providing comprehensive, integrated services to eligible youth, including the neediest youth populations (out-of-school youth, children of incarcerated parents, court-involved youth, youth at risk of court involvement, homeless and runaway youth, Indian and Native American youth, migrant youth, youth most at risk of dropping out, youth in or aging out of foster care, and youth with disabilities) and any local requirements and activities to assist youth who have special needs or barriers to employment, including those who are pregnant, parenting, or have disabilities
  - how the LWIB will coordinate across the local agencies responsible for foster care, education, human services, juvenile justice, housing, transportation, and other relevant resources as part of the strategy
  - what efforts, if any, are being made to connect WIA youth to the workforce development system and how youth are being exposed to career awareness, work readiness and the workforce development system
  - the strategy for exposing youth to the area's targeted industries and the necessary skills and training needed to work in those industries
  - the efforts to be undertaken to build a "pipeline" of future workers for those industries
  - how the design framework incorporates literacy and numeracy elements, and certificates, in accordance with USDOL Common Measures Policy
  - the LWIB's definition of "deficient in basic literacy skills" and "requires additional assistance to complete an educational program, or to hold and secure employment "

(20 CFR 664.205 and 664.210) and how these definitions will impact the key workforce issues

6. Youth Council - WIA requires that a Youth Council be established as a subgroup of the local board (20 CFR 661.335). Describe:
  - the current and future goals of the Youth Council as aligned with the overall strategic goals of the local area, including how representatives from targeted industries will contribute to the makeup and activities of the Youth Council
  - what outreach and connections to other youth services and providers will be collaboratively planned to ensure the provision of integrated youth services
7. Supportive Services - Describe the board policy on the delivery of supportive services for participants. Including:
  - procedures for referrals to such services, including how the services will be funded when they are not otherwise available from other sources
  - limits on the provision of supportive services (established by the LWIB or the One-Stop Operator)
8. Follow-Up - The goal of follow-up services is to ensure job retention, wage gains and career progress for participants who have been referred for unsubsidized employment. Follow-up services **must** be made available for a minimum of 12 months following the date of exit. Describe
  - the local policy regarding follow-up services
  - which follow-up services are provided using WIA funds
9. Describe the local levels of performance negotiated with the Governor and the chief elected official(s) used by the LWIB for measuring the performance of the local fiscal agent (where appropriate), eligible providers, and the local One-Stop delivery system. Also describe:
  - how the established WIA Performance levels impact services and strategies and how levels are monitored
  - how the WIA local performance levels are communicated to staff, partners, providers and stakeholders so that their role in helping to achieve those performance levels is understood
  - if the LWIA has failed any of the performance measures in the past program year,
    - what actions the board has taken with its providers to identify service delivery weaknesses
    - what changes have been made to policy, service delivery, providers, engagement of partners, memberships on board and councils, etc., to provide improved program performance
    - how those changes have been incorporated or aligned with key workforce challenges and planning strategies
    - what strategies are being devised to exceed standards, improve services and increase market penetration

10. Local Monitoring – Describe:

- how frequently financial, program, and performance monitoring is conducted
- how the LWBI ensures consistency and quality in how monitoring is conducted and reported
- How monitoring reports are used to improve services, identify systemic problems and initiate corrective action
- under what circumstances an issue arising from a monitoring report is brought before the full board
- what role the LWIB plays in requiring corrective action and what challenges the LWIB anticipates in taking action on the monitoring reports

11. Describe how the process used by the LWIB provides opportunity for public comment, including comment by representatives of business and labor organizations, and input into the development of the local WIA plan, prior to submission of the plan.

**OPTIONAL REGIONAL PLANNING REQUIREMENTS:**

While a unified plan is not a requirement for being compliant with local planning, achieving the outcomes of system certification (by whatever process), which includes the unified plan, will serve as an innovation and best practice and will put those areas that achieve those outcomes in a position to be recognized for best practices/ innovation, provide enhanced customer service and better meet wealth creation metrics.

In addition to the required plan content found at 118 (a)(b) of the act.:

- a) has common outcomes/goals that all system partners are working together to achieve;
- b) has common identified measures that are tracked among all system partners;
- c) states how the programs of the system partner entities support the overall goals of the region;
- d) outlines the roles and responsibilities of each of the system partners and states how each system partner supports making their students/clients citizen ready, career ready, and college ready;
- e) outlines the process/agreement in place for sharing data from both students/clients and from employers.
- f) overall, describes how the partners will work jointly to ensure that there is a pipeline of appropriately skilled and credentialed Oklahoman's to support the regions business expansion, business retention and business attraction efforts.

In doing so, the regional unified plan will assist partners within a region to become a collaborative system. Within that system, partners understand what role(s) each agency plays in helping the region meet its workforce/talent pipeline needs, and customers, both job seeker and business, can be served in a holistic manner.

Areas working toward system certification can submit the items listed above at any time in the certification process.

**ACTION REQUIRED:**

Submission (signed by the LWIB Chair and Chief Elected Official) can be through e-mail at [jeane\\_burruss@okcommerce.gov](mailto:jeane_burruss@okcommerce.gov) or mail planning documents to:

Oklahoma Department of Commerce  
Workforce Solutions  
Attention: Jeane Burruss  
900 N. Stiles Ave.  
Oklahoma City, OK 73104

**Due by 5:00 p.m. on October 31, 2014.**

All plans will be reviewed by the Systems Oversight Committee of the Governor's Council for Workforce and Economic Development and recommended to the Governor for approval by the full council.

If necessary, the local plan can be submitted to ODOC by due date while simultaneously posting for public comment. Should you receive any comments that change the content of the plan we would simply need a revised copy submitted. Under this scenario, the dates would be as follows:

Local Plans are due October 31<sup>st</sup>.

30 day Public Comment: concludes November 30<sup>st</sup>

If applicable, resubmit revised plan to ODOC: December 10<sup>th</sup>

**RESCISSIONS:** This issuance rescinds Oklahoma Workforce Development Issuance (OWDI) # 01-2013.

**INQUIRIES:** If you have questions pertaining to this issuance, please contact Jeane Burruss, Project Director, (405) 815-5256, or email at [jeane\\_burruss@okcommerce.gov](mailto:jeane_burruss@okcommerce.gov) or Tina Lindsay, Deputy Director, Workforce Solutions, (405) 815-5137 [tina\\_lindsay@okcommerce.gov](mailto:tina_lindsay@okcommerce.gov).